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REGISTER OF ACTIONS

CASE NO. CV-2011-01197

Karen Myers Cross Vs. ACS State & Local Solutions, Inc.

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Case Type: Other Civil
 Date Filed: 04/27/2011
 Location: County Court At Law #2
 Judicial Officer: Ramirez, Robert C
 File Custody/Location: Active Shelf

PARTY INFORMATION

Defendant ACS State & Local Solutions, Inc.

Lead Attorneys

Plaintiff Cross, Karen Myers

SHARON K. CAMPBELL

Retained

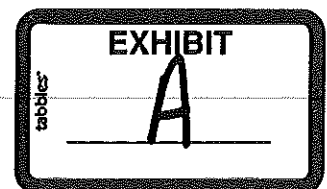
214-351-3260(W)

EVENTS & ORDERS OF THE COURT

OTHER EVENTS AND HEARINGS	
04/27/2011	Plaintiff's Original Petition (OCA)
04/27/2011	Cover Letter / Request
04/29/2011	Citation
	mailed to attorney
	ACS State & Local Solutions, Inc.
	Unserved

FINANCIAL INFORMATION

Plaintiff Cross, Karen Myers		
Total Financial Assessment		196.00
Total Payments and Credits		196.00
Balance Due as of 05/26/2011		0.00
04/27/2011	Transaction Assessment	196.00
04/27/2011	Payment Receipt # 2011-2933	(196.00)
	CAMPBELL, SHARON K.	



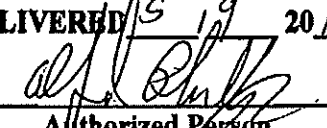
CYNTHIA MITCHELL, COUNTY CLERK
DENTON COUNTY
1450 E. MCKINNEY, 2nd Floor
DENTON, TEXAS 76209
940-349-2016

www.dentoncountyclerk.com/ccl

PLAINTIFF'S ATTORNEY
SHARON K. CAMPBELL
3100 MONTICELLO AVE #500
DALLAS TX 75205

214-351-3260

CITATION
CV-2011-01197

DELIVERED 5/19/2011

Authorized Person

THE STATE OF TEXAS

ANY SHERIFF OR CONSTABLE OR OTHER PERSON AUTHORIZED BY LAW OR COURT
ORDERED TO SERVE CITATION:

TO: ACS State & Local Solutions, Inc.
Registered Agent Corporation Service Company
d/b/a CSC-Lawyers Incorporating Service Company
211 E 7th St Suite 620
Austin, TX 78701-3218

"OR WHEREVER THEY MAY BE FOUND"

Defendant, in the hereinafter styled and numbered cause:

NOTICE TO DEFENDANT: "You have been sued." You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 A.M. on the Monday next following the expiration of twenty days after you were served this citation and petition, a Default Judgment may be taken against you.

YOU ARE HEREBY COMMANDED to file a written answer to the Plaintiff's Original Petition (OCA) a copy of which accompanies the Citation, before the County Court At Law #2, 1450 E. McKinney, 2nd Floor, Denton, Denton County, Texas, at or before 10:00 a.m. of the Monday next after the expiration of 20 days after the date of service hereof, in

Cause Number CV-2011-01197, styled

Karen Myers Cross Vs. ACS State & Local Solutions, Inc.

filed in said Court 04/27/2011.

The nature of the Plaintiff's demand is fully shown by a true and correct copy of the named petition accompanying this citation and made a part hereof.

The officer executing this citation shall promptly serve the same according to requirements of law, and the mandates thereof, and make due return as the law directs.

ISSUED AND GIVEN UNDER MY HAND AND SEAL OF SAID COURT AND OFFICE on
this the 29th day of April, 2011.

CYNTHIA MITCHELL,
COUNTY CLERK DENTON, TEXAS

BY: 
Theresa Robertson, Deputy Clerk



OFFICER'S RETURN/ CERTIFICATE OF DELIVERY

THE STATE OF TEXAS

COUNTY OF _____

Came to hand on the _____ day of _____, _____, at _____ M.

Executed in the City of _____, County of _____, State of Texas.

At the address of _____

On the _____ day of _____, _____ at _____ M. by delivering to the within named: _____

Each, a copy of this Citation in CV-2011-01197, together with the accompanying copy of this pleading, having first endorsed on same the date of delivery.

For Serving Citation	\$ _____	Sheriff/Constable	_____
For Mileage	\$ _____	County of	_____
For Notary	\$ _____	State of	_____
Total Fees:	\$ _____		

By: _____
Officer/Authorized Person
I.D.# _____

VERIFICATION:

This day personally appeared _____ known to me to be the person whose name is subscribed on the foregoing instrument and who stated under oath: I am competent to make this oath. I attest that the foregoing instrument was delivered by me in the exact manner recited on this return. I am authorized by law or written court order to deliver this process. I am over the age of eighteen years, I am not a party to or interested in the outcome of this suit. All statements of facts are based on my personal knowledge and are true and correct.

Subscribed and sworn to before me this the _____ day of _____, _____.

Notary Seal

Notary Public in and for the State of _____

*If served outside the State of Texas the server must sign and swear to this return before a notary public or other officer authorized to take affidavits

FILE FOR RECORD
DENTON COUNTY CLERK

 COPY

CAUSE NO. CV - 2011-01197

APR 27 2011

CYNTHIA MITCHELL
DEPUTY

KAREN MYERS CROSS

VS.

ACS STATE & LOCAL SOLUTIONS, INC.

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IN THE COUNTY COURT

AT LAW # 2

DENTON COUNTY, TEXAS

PLAINTIFF'S ORIGINAL PETITION

Now comes Karen Myers Cross, complaining of ACS State & Local Solutions, Inc., and for cause of action would show the Court as follows:

PARTIES

Plaintiff, Karen Myers is a natural person who resides in Denton County, Texas.

Defendant, ACS State & Local Solutions, Inc. is a corporation organized under the laws of the state of New York and may be served with process by serving its registered agent for service of process: Corporation Service Company d/b/a CSC-Lawyers Incorporating Service Company, 211 E. 7th St., Suite 620, Austin, Texas 78701-3218.

FACTUAL ALLEGATIONS

Defendant issued to Plaintiff a Texas debit card to be used for receiving funds for child support from the office of the Texas Attorney General. The card is called an "Eppicard."

In June, 2010, just after the monthly child support payment was deposited on her debit card, Plaintiff noticed that a large number of charges had been made to the debit card which resulted in eliminating the entire deposit made to the card. These charges were not made by Plaintiff nor authorized by her.

Plaintiff immediately called the number on the back of the debit card to lodge a complaint about the unauthorized charges and followed up by making a written dispute.

Defendant refused to acknowledge the legitimacy of Plaintiff's dispute and refused to credit back the sums to Plaintiff's debit card. Plaintiff sent a second written dispute to Defendant. No response was received to the second dispute. Plaintiff retained the services of an attorney who made an additional written dispute. No response was received to the third dispute.

ELECTRONIC FINANCIAL TRANSACTIONS ACT

Defendant has violated 15 U.S.C. §1693f by not conducting a reasonable investigation of the dispute and by denying the dispute when it did not have a reasonable basis for believing that Plaintiff's account was not in error.

Under the EFTA, Plaintiff's liability for unauthorized withdrawals is limited to \$50.00.

The unauthorized charges or withdrawals from Plaintiff's debit card total approximately \$1700.00.

Pursuant to 15 U.S.C. §1693f and 1693m, Defendant's actions entitle Plaintiff to actual damages, treble damages, court costs and attorney fees for which Plaintiff sues herein to recover.

By reason of the allegations in this petition, Plaintiff is entitled to recover attorney's fees in a sum that is reasonable in relation to the amount of work expended for which Plaintiff sues herein. The attorney whose name is subscribed to this pleading has been employed to assist Plaintiff in the prosecution of this action.

Prayer for Relief

WHEREFORE, the Plaintiff prays that this Court:

1. Declare that Defendant's actions violate the EFTA.
2. Enter judgment in favor of Plaintiff and against Defendant for actual damages, treble damages, costs, and reasonable attorney fees as provided by 15 U.S.C. §1693f and 1693m.
3. Grant such further relief as deemed just.

TRIAL BY JURY IS DEMANDED.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Sharon K. Campbell". The signature is fluid and cursive, with the first name "Sharon" and last name "Campbell" clearly distinguishable.

Sharon K. Campbell
State Bar # 03717600
3100 Monticello Ave., Suite 500
Dallas, Texas 75206
Telephone: 214/351-3260
Fax: 214/378-6670
Sharon@SharonKCampbell.com